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Attorneys for Defendant
Asset Acceptance, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SABRENA ALIAS,

Plaintiff,

vs.

EXPERIAN INFORMATION
SOLUTIONS, INC.; TRANSUNION,
LLC; GMAC MORTGAGE, LLC;
COUNTRY FINANCIAL
SERVICES; BARCLAY'S BANK
DELAWARE; SCHOOLS
FINANCIAL CREDIT UNION;
WELLS FARGO FINANCIAL
NATIONAL BANK; ASSET
ACCEPTANCE, LLC, and DOES 1
through 100 inclusive,

Defendants.

CASE NO.: 5:15-cv-03057-EJD

**STIPULATION TO EXTEND TIME
FOR DEFENDANT ASSET
ACCEPTANCE, LLC TO RESPOND
TO INITIAL COMPLAINT**

Complaint Filed: May 19, 2015
Complaint Served: June 1, 2015

Removal Date: July 1, 2015

Current Response Date: July 8, 2015
New Response Date: August 28, 2015

1 IT IS HEREBY STIPULATED by and between Plaintiff Sabrena Alias
2 (“Plaintiff”) and Defendant Asset Acceptance, LLC (“Defendant”), by and through
3 the undersigned counsel of record, as follows:

4 WHEREAS, on May 19, 2015, Plaintiff filed her Complaint in the Superior
5 Court of the State of California, County of Santa Clara, Case No. 115-CV-280853;

6 WHEREAS, on June 1, 2015, Plaintiff served the Complaint on Defendant;

7 WHEREAS, on June 4, 2015, defendant Wells Fargo Bank, N.A. (sued as
8 “Wells Fargo Financial National Bank” and as “Wells Fargo”) removed the action to
9 this Court;

10 WHEREAS, Defendant’s initial deadline to respond to the Complaint was July
11 8, 2015;

12 WHEREAS, Defendant requires additional time to investigate the claims
13 asserted in the Complaint and prepare its response to the Complaint;

14 WHEREAS, the Parties have agreed to extend the date for Defendant to
15 respond to the Complaint from July 8, 2015, to August 28, 2015;

16 WHEREAS, Defendants has not previously sought a continuance;

17 WHEREAS, this Stipulation will not alter the date of any event or any
18 deadline already fixed by Court order, local rules, or the Federal Rules of Civil
19 Procedure;

20 THEREFORE, the parties stipulate and agree that Defendant’s response to the
21 Complaint in this matter shall be due no later than August 28, 2015.

22 **IT IS SO STIPULATED.**

23
24 DATED: July 23, 2015

SIMMONDS & NARITA LLP
TOMIO B. NARITA
LIANA MAYILYAN

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27 By: /s/ Liana Mayilyan
Liana Mayilyan
Attorneys for Defendant
28 Asset Acceptance, LLC

1 DATED: July 23, 2015

SAGARIA LAW, P.C.
ELLIOT W. GALE

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3 By: /s/ Elliot W. Gale
4 Elliot W. Gale
5 Attorneys for Plaintiff
6 Sabrena Alias
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8 I, Liana Mayilyan, am the ECF user whose identification and password are
9 being used to file this Stipulation. I hereby attest that Elliot W. Gale has concurred
10 in this filing.
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12 /s/ Liana Mayilyan
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